File No.: 13250

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 22-20904 CMB

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Edward D. Gourn, Jr. and Lauren B. Gourn, : Chapter 13

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Debtors, : Document No.

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Edward D. Gourn, Jr. and Lauren B. Gourn, :

:

Movants,

:

VS.

:

No Respondents. :

#### CONSENT ORDER GRANTING SUBSTITUTION OF ATTORNEY

Notice is hereby given that, subject to approval by Court, Debtors, Edward D. Gourn, Jr. and Lauren B. Gourn, hereby request to substitute Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr, 1310 Morrell Avenue, Suite C, Connellsville, PA 15425 as Counsel of Record in place of Daniel R. White, Esquire and Zebley, Mehalov & White, P.C., 18 Mill Street Square, Uniontown, PA 15401.

Contact information for new Counsel is as follows:

Firm Name: Tremba, Kinney, Greiner & Kerr

Address: 1310 Morrell Avenue, Suite C, Connellsville, PA 15425

Telephone: 724-628-7955

Email: dwhite@westpalawyers.com

We, the Debtors in this case, consent to the above substitution and hereby assign all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley Mehalov & White, P.C. as of the date of this Order, instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr and that the distribution of fees to Zebley, Mehalov & White, P.C. is terminated as of December 31, 2023. The terms of the new representation shall be identical to the terms of the original retainer agreement with Zebley, Mehalov & White, P.C., assigning all rights and obligations from Zebley, Mehalov & White, P.C. to Daniel R. White,

Esquire and Tremba, Kinney, Greiner & Kerr. We have signed a new fee agreement with Tremba, Kinney, Greiner & Kerr.

/s/Edward D. Gourn, Jr.
Edward D. Gourn, Jr., Debtor

/s/ Lauren B. Gourn
Lauren B. Gourn, Joint Debtor

The law firm of Zebley, Mehalov & White, P.C. consents to being substituted and hereby assigns all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley, Mehalov & White, P.C., as of the date of this Order, instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr and to terminate the distribution to Zebley, Mehalov & White, P.C. as of December 31, 2023. The terms of the new representation shall be identical to the terms of the original retainer agreement with Zebley, Mehalov & White, P.C., assigning all rights and obligations from Zebley, Mehalov & White, P.C. to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr.

/s/ Charles O. Zebley
Charles O. Zebley, Esquire
/s/ Mark M. Mehalov
Mark M. Mehalov, Esquire
/s/ Daniel R. White
Daniel R. White, Esquire

Current Counsel of Record, Daniel R. White, Esquire consents to the above substitution and agrees that all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley, Mehalov & White, P.C. as of the date of this Order, instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr and that the distribution of fees to Zebley, Mehalov & White, P.C. is terminated as of December 31, 2023. The terms of the new representation shall be identical to the terms of the original retainer agreement with Zebley, Mehalov & White, P.C., assigning all rights and obligations from Zebley, Mehalov & White, P.C. to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr.

/s/ Daniel R. White Daniel R. White, Esquire

The Chapter 13 Trustee, Ronda J. Winnecour, by her Counsel, Owen W. Katz, Esquire, consents to the above substitution, agrees that all remaining, unpaid and future legal fees (inclusive of balances outstanding on no-look fees and fee applications whether approved or outstanding) due to be paid to Daniel R. White, Esquire and Zebley, Mehalov & White, P.C. as of the date of this Order, and are directed instead to be remitted to Daniel R. White, Esquire and Tremba, Kinney, Greiner & Kerr at 1310 Morrell Avenue, Suite C, Connellsville, PA 15425 and that the distribution of fees to Zebley, Mehalov & White, P.C. is terminated as of December 31, 2023.

/s/Owen W. Katz Owen W. Katz, Esquire Office of the Chapter 13 Trustee US Steel Tower, Suite 3250 600 Grant Street Pittsburgh PA 15219 (412) 471-5566 x3124 okatz@chapter13trusteewdpa.com

U.S. Bankruptcy Judge

FILED 1/26/24 1:06 pm CLERK U.S. BANKRUPTCY COURT - WDPA

# Case 22-20904-CMB Doc 76 Filed 01/28/24 Entered 01/29/24 00:28:21 Desc Imaged Certificate of Notice Page 4 of 5

United States Bankruptcy Court Western District of Pennsylvania

In re: Case No. 22-20904-CMB

Edward D. Gourn, Jr. Chapter 13

Lauren B. Gourn
Debtors

CERTIFICATE OF NOTICE

District/off: 0315-2 User: auto Page 1 of 2
Date Rcvd: Jan 26, 2024 Form ID: pdf900 Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol Definition

Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS

regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 28, 2024:

Recipi ID Recipient Name and Address

db/jdb + Edward D. Gourn, Jr., Lauren B. Gourn, 2015 Baldridge Ave., Connellsville, PA 15425-5232

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

### BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

#### NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 28, 2024 Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 26, 2024 at the address(es) listed below:

Name Email Address

Brian Nicholas

on behalf of Creditor PENNYMAC LOAN SERVICES LLC bnicholas@kmllawgroup.com

Daniel R. White

on behalf of Joint Debtor Lauren B. Gourn

lori@zeblaw.com; r63228@notify.best case.com; elisa@zeblaw.com; ethomas@westpalawyers.com; kcostello@westpalawyers.com; kcostello@

Daniel R. White

on behalf of Debtor Edward D. Gourn Jr.

lori@zeblaw.com; r63228@notify.best case.com; elisa@zeblaw.com; ethomas@westpalawyers.com; kcostello@westpalawyers.com; and the control of the control of

Office of the United States Trustee

ustpregion 03. pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecf@chapter13trusteewdpa.com

Page 2 of 2 District/off: 0315-2 Form ID: pdf900 Total Noticed: 1 Date Rcvd: Jan 26, 2024

TOTAL: 5